

NANC

**2012
PA
Performance
Evaluation
Report**

**Prepared by the
Numbering Oversight Working Group (NOWG)**

June 20, 2013

2012 PA Performance Evaluation Report

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Executive Summary

The FCC and the North American Numbering Council (NANC) charged the Numbering Oversight Working Group (NOWG) with compiling and delivering an annual performance report of the Pooling Administrator (PA). The PA's annual performance assessment is based upon:

- 2012 Performance Feedback Survey for PA and RNA (Routing Number Administrator)
- Written comments and reports
- Annual Operational Review
- NOWG observations and monthly interactions with the PA

The PA's rating for the 2012 performance year was determined by the NOWG to be **Exceeded**. This rating is defined below:

EXCEEDED	<p>Exceeded performance requirement(s)</p> <ul style="list-style-type: none">• Provided excellence above performance requirements and exceeded expectations• Performance was well above requirements• Decisions and recommendations exceeded requirements and expectations
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The 2012 survey results revealed a high level of satisfaction that respondents attributed to the professionalism, responsiveness, and expertise exhibited by the PA and RNA personnel throughout 2012.

In 2012, the PA consistently exceeded its required responsibilities. Highlights included:

- The RNA successfully and seamlessly transitioned from the interim RNA (IRNA) to the permanent RNA function.
- Routing Number Administration System (RNAS) was made available for public use on time on March 19, 2012. Scheduled availability for RNAS was maintained at 100% throughout 2012, which exceeded the contract performance metric of 99.9%.
- During Hurricane Sandy, the PA kept the Help Desk open over the weekend to assist service providers as needed.
- The PA initiated a special project to request donations for 66 rate centers being changed from Excluded to Optional. The PA was able to obtain donations for 58 of the 66 rate centers, thereby potentially saving the opening of 58 NXX codes.

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Section 1.0 Performance Review Methodology

The annual PA Performance Evaluation is a summary of significant events that were accomplished during the 2012 performance year. In addition to the annual performance review survey process, the NOWG's interactions with the PA included the following:

- Annual operational review
- Change Order review process
- PA NANC reports
- Monthly NOWG/PA status meetings
- Interaction with the industry

The implementation of the permanent p-ANI administration functions (Routing Number Administrator - RNA) occurred on March 19, 2012. Due to the fact that the user communities are different for the RNA functions and the PA functions, separate performance surveys were conducted. The combined quantitative results have been included in the PA Performance Review Methodology for 2012. The methodology used by the NOWG in weighting the quantitative responses from the surveys is as follows:

Each rating category was assigned a point value (Exceeded = 5, More Than Met = 4, Met = 3, Sometimes Met = 2, Not Met = 1). The NOWG multiplied the corresponding point value by the number of responses in that category and then divided the results by the total number of respondents to the question.

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The following chart provides the definition of each rating category:

Satisfaction Rating	Used when the PA...
EXCEEDED	Exceeded performance requirement(s) <ul style="list-style-type: none">• Provided excellence above performance requirements and exceeded expectations• Performance was well above requirements• Decisions and recommendations exceeded requirements and expectations
MORE THAN MET	Met and often went beyond performance requirement(s) <ul style="list-style-type: none">• Provided more than what was required to be successful• Performance was more than competent and reliable• Decisions and recommendations usually exceeded requirements and expectations
MET	Met performance requirement(s) <ul style="list-style-type: none">• Met requirements in order to be considered successful• Performance was competent and reliable• Decisions and recommendations were within requirements and expectations
SOMETIMES MET	Sometimes met performance requirement (s) <ul style="list-style-type: none">• Was inconsistent in meeting performance requirements• Performance was sometimes competent and reliable• Decisions and recommendations were sometimes within requirements
NOT MET	Did not meet performance requirement(s). <ul style="list-style-type: none">• Administrative tasks and objectives were not within requirements in order to be considered successful• Performance was unreliable and commitments were not met• Decisions and recommendations were inconsistent with requirements
N/A	Did not observe activity or does not apply to service provider/regulator

The NOWG will present preliminary findings to the FCC and the PA. The final report will be presented to the NANC for endorsement and then forwarded to the FCC.

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Section 2.0 PA Reports

2.1 PA Annual Report

The annual report prepared by the PA is a requirement in the Pooling Administrator Technical Requirements document. The status of pooling and Pooling Administration should be reported in the annual report. Review of this annual report is part of the NOWG's annual performance review process. At a minimum, the annual report is required to contain the following information:

- Brief description of the PA
- Highlights/significant milestones reached during the previous year
- Identification of existing and potential pooling areas
- Aggregated total, by pool, of the service providers participating in the pooled area
- Forecast results, as well as a review of forecasts vs. actual past block activations
- System and performance metrics
- Status of required transferable property
- Industry issue identification/feedback
- Volume of reports produced aggregated by regulatory agency, NANC, NANPA, and service providers
- Additional informational offerings

Prior to this year's on-site operational review, the PA provided the NOWG with an opportunity to review the draft copy of the 2012 Annual Report. During the on-site operational review in Concord, California in March 2013, the PA staff reviewed the 2012 highlights which were also included in the annual report.

Overall, the annual report provides a comprehensive snapshot of pooling and the PA for 2012. The PA 2012 Annual Report was filed with the FCC and is posted for general availability on the PA's website at www.nationalpooling.com.

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2.2 PA NANC Report

The PA reported its monthly numbering activities to the NANC and the NOWG. Additionally, the PA made presentations at four NANC meetings in 2012, reporting the status of thousands-block pooling administration, p-ANI activities, and events affecting the performance of the PA, which included the following:

- Volume of pooling assignments, donations and applications processed
- Codes opened to replenish pools and establish LRNs
- Pools with less than six months inventory vs. forecasts
- Summaries of monthly reports to the FCC
- Number of blocks reclaimed
- Percent availability of PAS and RNAS
- Status and implementation of change orders
- Updates to PAS
- Updates to the PA website
- p-ANI summary
- Results of the 2012 Pooling Administration Survey

2.3 NOWG Monthly Reports

Throughout 2012, the NOWG and PA followed a standing agenda during the scheduled monthly calls. The PA provided monthly performance reports that were reviewed during the monthly calls with the NOWG. The quality and content of these reports provided the NOWG with valuable insight into the operations of the PA. Some of the standing agenda topics include:

- Rate Center Pooling Status
- Application Processing
- p-ANI
- Customer Focus

See Appendix A for 2012 PA / NOWG Standing Agenda

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Section 3.0 Customer Focus / Issues Log

Customer Focus

In 2012, at the monthly NOWG/PA meetings, the PA provided a report on customer focus items that they executed to help service providers and regulators. Customer focus items cover both contractual and non-contractual initiatives related to customer service.

There were 72 customer focus items from January 2012 through December 2012. Customer focus items included, but were not limited to, the following:

- Provided assistance to service providers on block donations
- Provided time-saving and special reports for both service providers and regulators
- Provided education and assistance on p-ANI resources
- Provided service provider and regulator training
- Provided Help Desk availability over Hurricane/Superstorm Sandy weekend

PA/NOWG Issues Tracking Log

The tracking log is used to document ongoing issues. The log, which includes metrics on the create date, issue name, summary and status, keeps the NOWG informed until issues are brought to resolution/closure.

There were no new issues added to this log in 2012. There was one issue closed in 2012 (INC Issue 715) regarding the donations over 10 percent contaminated.

See Appendix B for 2012 PA / NOWG Issues Tracking Log

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Section 4.0 2012 PA Performance Survey Results

4.1 PA Survey Ratings – Quantitative Analysis

The PA 2012 Performance Surveys were completed by a total of 98 respondents:

68 Industry and Other Respondents

30 Regulator Respondents

The results are as follows:

- Pooling Administrator (Section A)
 - There were 4 questions in this section to which respondents provided the following aggregated response ratings:
 - 103 as Exceeded
 - 108 as More than Met
 - 35 as Met
 - 2 as Sometimes Met
- Pooling Administration System (PAS) (Section B)
 - There were 3 questions in this section to which respondents provided the following aggregated response ratings:
 - 103 as Exceeded
 - 88 as More than Met
 - 63 as Met
 - 1 as Sometimes Met
- PA Website (Section C)
 - There was 2 questions in this section to which respondents provided the following aggregated response ratings:
 - 60 as Exceeded
 - 76 as More than Met
 - 50 as Met
 - 4 as Sometimes Met
- Miscellaneous Pooling Administration (PA) Functions (Section D)
 - There were 4 questions in this section to which respondents provided the following aggregated response ratings:
 - 87 as Exceeded
 - 107 as More than Met
 - 90 as Met
 - 4 as Sometimes Met

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- Overall Assessment of Pooling Administrator (PA) (Section E)
 - There was 1 question in this section to which respondents provided the following aggregated response ratings:
 - 37 as Exceeded
 - 43 as More than Met
 - 16 as Met

See Appendix C for 2012 PA Survey Metrics and Bar Charts, and Appendix D for 2012 PA Survey Cover Letter and Performance Survey

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4.2 PA Survey Written Comments

The survey allowed respondents the opportunity to provide detailed written comments regarding their satisfaction or dissatisfaction with the PA's performance in 2012. The majority of comments were positive, with only a few containing suggestions for areas of improvement. The NOWG reviewed all comments to determine if there was a common theme substantiated by multiple respondents.

The following is a summary of written comments that were provided by survey respondents:

- Outstanding praise for the PA staff was a consistent theme throughout the survey:
 - Provides excellent support, assistance, and technical expertise
 - Always prompt, helpful, and courteous
 - Professional, friendly, and responsive
 - Willing to go the extra mile to provide top notch service to their customers
- Comments suggesting improvements were mostly isolated. Comments pertained to:
 - Process clarification questions
 - Suggestions for PAS and website enhancements

The NOWG concluded that the written comments were not indicative of any consistent performance issues, and in many cases provided significant praise for individual PA staffers. Samples of the written comments received are provided below:

"The PA administrators have exceeded my expectations in 2012. Their execution to approve, deliver, and respond according to requests and questions always exceeded the standard interval. They perform quality work regardless of volume or questions."

"Staff at the PA has been great to deal with. I appreciate the time they take to explain often complex issues in a detailed manner. And that they are knowledgeable in their field."

"PA staff is very knowledgeable and readily provides assistance."

"The PA is extremely helpful when I need answers. All the PA staff seem to do their jobs with good cheer. A+"

"They are always helpful, professional and patient with any questions I bring to them."

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“Always a pleasure to work with! When issues do arise, the PA staff handles them quickly and always provides assistance with understanding why the issue occurred. Especially appreciate all the work that the PA does to find new code holders.”

“Responses to inquiries and problems are always handled promptly and accurately.”

“The PAs have been great to work with as they respond promptly, courteously and professionally.”

“All of my routine work experiences with Pooling Administration staff have been positive. I get prompt responses to emails or calls, and, any questions regarding pooling procedures have been explained clearly, usually by referencing the exact section of the TBPAG, as appropriate.”

See Appendix E for 2012 PA Survey Respondents and Appendix F for 2012 PA Survey Respondents' Comments

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Section 5.0 Operational Review

The NOWG members met with the PA representatives in Concord, California on March 13 and 14, 2013 to conduct the annual on-site operational review. During this review, the PA staff presented an overview and highlights of 2012 activities. The presentation included the Pooling Administration operations, NANP resource trending, external relations and training, change orders, pooling quality assurance, and regulatory compliance.

The PA staff also presented the status of escalations, industry forum participation, technical operations, pooling reports, special projects, and p-ANI administration.

Key highlights presented to the NOWG included:

- Total Applications Processed in 2012:
 - Issued 130,407 Part 3s
 - Assigned 47,074 thousands blocks
 - Opened 2,588 NXX codes
 - 99.998% of all applications processed within seven calendar days or less (requirement is 97%)
- Customer Support Desk received 1,895 calls; 100% answered within one business day
- Trouble Tickets:
 - Opened three new trouble tickets in 2012 to correct PAS system errors
 - Closed two new trouble tickets in 2012 to correct PAS system errors
- Reclaimed 15 blocks in 2012
- Average score of 4.7 out of 5.0 on the annual survey conducted by the PA
- Training:
 - Five state educational sessions
- Reports:
 - 658 reports to the FCC, states, NANC, NANPA, and SPs
 - 105 required Contract Data Requirements List (CDRL) reports submitted on time
 - 59 additional contract-required reports submitted on time
 - All ad hoc reports done in less than one business day (Contract allows three business days)

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- Implemented three NPA overlays in PAS in 2012
- Two rate center consolidations implemented in PAS in 2012
- Implemented four change orders in 2012
- Participated in 55 industry meetings
- No formal complaints made to PA
- Met or exceeded all system requirements with 99.998% availability – exceeding the contract performance metric of 99.9% availability
- Pooling Help Desk available over Hurricane/Superstorm Sandy weekend

Appendix G for 2012 PA Operational Review Presentation and Appendix H for 2012 PA Highlights

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Section 6.0 Pooling Administration System (PAS)

The Pooling Administration System (PAS) was available 99.998% of the time in 2012 – even during two system builds to implement four change orders. The only unscheduled downtime for the year totaled 12 minutes and 3 seconds out of 8,784 possible hours in 2012. The unscheduled PAS unavailability occurred during routine database maintenance for a time zone change on the database server. Neustar encountered a problem with the PAS failover from Sterling to Charlotte which caused PAS to be inaccessible during non-core business hours until the failover was reversed and the application was restored to Sterling.

Out of the possible 24 hours of scheduled downtime allowable by the contract, the PA used only 2 hours and 52 minutes of scheduled downtime as a result of 11 approved scheduled maintenance events. The PAS database was upgraded to the latest major release of Oracle, and the PAS firewalls were upgraded. PAS users experienced very limited PAS unavailability as a result of these builds. Additionally, the PA completed disaster recovery testing during the weekend of October 26-28, 2012 with no downtime.

Overall, the industry was satisfied with the performance of PAS. This is apparent in the following sample of comments received on the surveys:

“I've never had any issues when using PAS to request resources, to make donations or inputting forecasts.”

“As a state regulator did not use PAS, but did get companies with late Part 4s to submit them and they were always entered in PAS the same day.”

“All PAS maintenance and availability to the NAS was always present for access when needed. No down time was experienced in 2012 that prohibited my use when accessed. The PAS data was accessible and accurate when I referenced this data. The ease and format of data in PAS makes for a great user friendly experience.”

“No issues with PAS in 2012 - system worked very well.”

“PAS is still a very user friendly tool and all the changes have made our jobs easier and efficient.”

There were also some enhancement suggestions and questions regarding the system or process:

“Perhaps some enhancements could be made in PAS to allow the ability to do multiple block disconnects on a Part 1A, instead of having to do them individually; this would be especially helpful when returning multiple blocks within the same code.”

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“There were a couple of times when a high demand rate center did not have any available number blocks and a new code had to be opened, which impacts our ability to serve our customers in a timely manner. Previously, PAS would email users regarding rate centers that needed replenishment and waive the months to exhaust so anyone could open a new code and add blocks. Why are we no longer notified of rate centers in dire need of replenishment so we can avoid this?”

“PAS has improved a lot from the day one I have used it. Keep up the good work and provide more useful and easy features. Under User Profile / Edit User Profile / Additional Contacts: I know that you can only put 3 contacts for all Part 3s, Part 4s Reminder, Pooling Notifications, etc. ** Expand the contacts to at least 5 instead of only 3 contacts? ** On Subscription choices, is there a way that a contact person can be provided a specific OCN(s) for Part 3s instead of all OCNs?...”

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Section 7.0 Change Orders

In 2012, the PA filed two new change orders with the FCC. The PA change order process complies with FCC contractual requirements. The 2012 change orders included:

- INC Issue 715 – Update TBPAG for retrieving a block donated/returned in error (Change Order 23)
- Enhancement of the FTP Interface with the Pooling Administration System (Change Order 24)

In 2012, the PA completed the implementation phase of four change orders approved by the FCC.

See Appendix I for 2012 PA Change Order Matrix Log

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Section 8.0 National Pooling Website

The website maintained by the PA provides number pooling information to service providers and regulatory agencies. In 2012, the PA continued to keep the information current on the website.

The training videos on the website continue to be viewed regularly. In 2012, the PA added four new training videos to the website:

- New to Pooling Quick Start
- Mass Modifications
- Change Order 20
- How to Complete the Months-to-Exhaust and Utilization Certification Worksheet – TN Level

In addition, the PA assisted NANPA with developing and posting its first training video, "How to Request an Initial Central Office Code in a Pooling Area."

Overall, the industry was satisfied with the website. This is apparent in the following sample of comments received on the surveys:

"PAS has improved a lot from the day one I have used it. Keep up the good work and provide more useful and easy features. The PAS website is user friendly and easy to navigate and provide entries to complete/submit requests and view information."

"The PA Website contains a wealth of statistical and reference information, which we access frequently during day-to-day operations."

"The PA staff was very helpful in helping me access information via pooling reports that I was previously unfamiliar with."

There were also some enhancement suggestions regarding the website:

"In general, I believe the PA website is organized well. I can navigate to the reports and information I want well enough. However, I've had the eyes of new staff in the past 6 months, and the site was found to be somewhat cluttered on the home page. The quick links at the home page was not found to be recognized as links due to the check boxes. This was initially taken as some sort of check list. This aside, I believe the website adequately contains all the information required when using PAS resources."

"Web site did not have a contact list that is Printer friendly. Printing cut off half of the page."

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Section 9.0 p-ANI (pseudo-Automatic Number Identification) / RNA (Routing Number Administrator)

After serving as the Interim Routing Number Administrator (IRNA) for p-ANI in 2011, the PA assumed the responsibility as the RNA in 2012. The PA completed development of the Routing Number Administration System (RNAS) and fully implemented their transition to the functions of permanent RNA by the “go-live” date of March 19, 2012.

The PA’s RNA functions performed in 2012 included, but were not limited to, the following:

- Developed, tested, and maintained RNAS and the p-ANI website
- Established the RNAS inventory of assigned and available non-dialable p-ANIs from data received from assignors and assignees of all p-ANI assignments already in existence
- Reviewed and compiled data obtained from multiple entities
- Worked with service providers to reconcile data discrepancies
- Conducted five web-based overview sessions on the new website and the new RNAS for service providers and regulators
- Trained RNAS users on the types of documentation required to assure that applicants were eligible to offer services in the areas in which they requested p-ANIs
- Continued to participate in meetings and work with the Industry Numbering Committee (INC) and Emergency Services Interconnection Forum (ESIF)

From the time that RNAS went live on March 19, 2012, there were no instances of unscheduled downtime. As a result, RNAS scheduled availability in 2012 was 100%.

Overall, the industry was satisfied with the PA’s RNA functions. This is apparent in both the quantitative results and written comments on the NOWG’s RNA Survey. Following is a sample of comments received on the survey:

“They are very responsive, efficient, organized and helpful. No complaints. Excellent at assisting folks understand the new processes and procedures. Always available to answer questions and help when needed!”

“Our interactions with the administrators have been very positive, they are thorough, polite, and very responsive. Florence Weber exceeded expectations when we needed emergency pANIs for a Superstorm Sandy situation.”

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“Diane and Florence are extremely helpful in making sure that we have the necessary information and correct NENAs and OCNs for all of the carriers. They have been nothing but extremely helpful. It is a pleasure working with them.”

“The RNA handled the rollout expertly and assisted SP whenever necessary. They should be commended for the way they handled the HUGE cleanup of duplicate assignments that were not foreseen until implementation. It was a large workload and very confusing for many.”

“Florence Weber and Dianne Calhoun went above and beyond in 2012; they were particularly patient and helpful in working with service providers to get the RNAS database populated and in resolving overlapping pANI range issues.”

“RNA has been very helpful any time I have ever had questions or issues.”

The survey also contained some suggestions for RNAS enhancements:

“We would like the function to be able to query by PSAP name.”

“Excellent service. No complaints. No complaints. If there were every any updates to the website, I'd request that our NENA ID and OCN be tied to our login name so that it would autofill so it's one less field we have to fill in.”

“We would like the ability to upload or attach an FCC license to an application instead of sending a separate email and referencing the tracking number of the application in the email.”

“I would like to be able to query a pANI range, not just a single pANI at a time in the pANI Lookup screen. I would like to see the assignment date in the pANI Lookup results screen.”

See Appendix J for 2012 RNA Survey Respondents and Appendix K for 2012 RNA Survey Respondents' Comments

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RNA Survey Ratings – Quantitative Analysis

The following quantitative results were included in the PA Performance Review Methodology for 2012.

The RNA 2012 Performance Survey was completed by a total of 11 respondents:

- 8 Industry and Other Respondents
- 3 Regulator Respondents

The results are as follows:

- Routing Number Administrator (Section A)
 - There were 3 questions in this section to which respondents provided the following aggregated response ratings:
 - 18 as Exceeded
 - 1 as More than Met
 - 2 as Met
 - 2 as Not Met
- Routing Number Administration System (RNAS) (Section B)
 - There were 3 questions in this section to which respondents provided the following aggregated response ratings:
 - 17 as Exceeded
 - 3 as More than Met
 - 6 as Met
 - 3 as Not Met
- RNA Website (Section C)
 - There were 2 questions in this section to which respondents provided the following aggregated response ratings:
 - 8 as Exceeded
 - 7 as More than Met
 - 4 as Met
 - 1 as Not Met
- Miscellaneous RNA Functions (Section D)
 - There were 3 questions in this section to which respondents provided the following aggregated response ratings:
 - 14 as Exceeded
 - 2 as More than Met
 - 3 as Met
 - 3 as Not Met

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- Overall Assessment of the RNA (Section E)
 - There was 1 question in this section to which respondents provided the following aggregated response ratings:
 - 7 as Exceeded
 - 2 as Met
 - 1 as Not Met

See Appendix L for 2012 RNA Survey Metrics and Bar Charts and Appendix M for 2012 RNA Survey Cover Letter and Performance Survey

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Section 10.0 Conclusion and Recommendation

The NOWG based its 2012 PA Performance Evaluation Rating on PA and RNA documentation, information collected, and observations throughout the review period year. Although emphasis continues to be given to the numeric and written survey comments, survey respondents may not always be familiar with the activities of the PA and RNA that occur “behind the scenes.” For the overall 2012 performance evaluation rating, the NOWG considered PA activities that included interaction with the NOWG and the NANC, and active participation at INC and other industry forums.

The survey results revealed a high level of client satisfaction with the continued professionalism and expertise exhibited by the PA personnel when performing their PA and RNA duties. The PA continued to demonstrate their ability to handle the large volume of block applications, while simultaneously completing special projects and the launch of the new RNA and RNAS.

In reviewing the rating criteria for the PA, the results of the data analysis yielded an “Exceeded” rating for the 2012 performance year.

The NOWG makes the following recommendations for the PA’s consideration in 2013:

- Ongoing review of internal training processes to ensure that consistency in understanding the processes and responding to service providers and regulators is communicated to the PA and RNA personnel.
- Ongoing review of the PA and RNA website to ensure accuracy and timeliness of data.
- Continue to consider process or system enhancements suggested by regulators and service providers.

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Section 11.0 Acknowledgements & NOWG Participants

The NOWG wishes to thank the following Neustar PA employees for their contributions throughout the year, for assisting the NOWG during the annual operational review, and with participating in the NOWG's monthly meetings.

List of PA / RNA Participants

Bruce Armstrong
Jan Connally
Tara Farquhar
Dara Flowers
Evelyn Freeman
Kevin Gatchell
Linda Hymans
Wayne Louie
Cecilia McCabe
Amy Putnam
Shannon Sevigny
Florence Weber
Gary Zahn
PA/p-ANI Help Desk and Pooling/p-ANI Administrators

The following working group members have participated in varying degrees by attending NOWG meetings throughout the year, attending the annual operational review, and contributing to the development of this document.

List of NOWG Participants:

Company

AT&T
CenturyLink
Cox Communications
EarthLink Business
Pennsylvania PUC
Sprint Nextel
Sprint Nextel
T-Mobile USA
Verizon Communications
Verizon Wireless
Windstream Communications
XO Communications

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Linda Richardson
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Christopher Hepburn
Rosemary Emmer
Karen Riepenkroger
Natalie McNamer
Laura Dalton
Dana Crandall
Michelle Bowyer
Ruben Galvan

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The NOWG would like to acknowledge and thank the following FCC members who attended the PA 2012 Operational Review via the conference bridge / online meeting link:

Gary Remondino
Myrva Charles

Contracting Officer's Technical Representative
Alternate Contracting Officer's Technical
Representative

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